UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY TRENTON DIVISION

DIONNE GOMES,)
Plaintiff,) Case No.: 3:12-CN-046+3
vs.) PLAINTIFF'S COMPLAINT
ROBERT JAMES & ASSOCIATES, INC.,) AND DEMAND FOR JURY TRIAL)
Defendant.))

MOTION FOR CONTINUANCE TO EXTEND TIME TO SERVE DEFENDANT

NOW COMES the Plaintiff DIONNE GOMES, by and through her Daniel P. Hartstein,
Esq. and hereby moves this Honorable Court to enter an order allowing the Plaintiff an additional
60 days to serve Defendant with Summons and Complaint, states as follows:

- 1. That on July 25, 2012, the Plaintiff filed a complaint against the Defendant.
- 2. That on July 26, 2012, the Plaintiff submitted the Notice of Lawsuit and Waiver of Service upon the Defendant via Certified Mail. (Exhibit 1)
- 3. That Defendant failed to return the Waiver of the Service of Summons in a timely manner and the return deadline for the Waiver of the Service of Summons was August 25, 2012.
- 4. That Plaintiff will retain a process server to effectuate service of the Complaint and Summons upon the Defendant.

WHEREFORE, Plaintiff respectfully requests that this Honorable enter an Order extend time to serve the Defendant with Summons and Complaint within sixty (60) days.

[ELECTRONIC SIGNATURED AFFIXED ON NEXT PAGE]

This 7th day of October, 2012.

/s/ Daniel P. Hartstein

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